

**UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT
BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.¹

PROMESA

Title III

No. 17 BK-3283-LTS

(Jointly Administered)

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT
BOARD FOR PUERTO RICO,

as representative of

THE PUERTO RICO HIGHWAYS AND
TRANSPORTATION AUTHORITY,

Debtor.

PROMESA

Title III

No. 17 BK-3567-LTS

**INFORMATIVE MOTION OF FINANCIAL OVERSIGHT AND MANAGEMENT
BOARD REGARDING JUNE 17, 2022 DISCLOSURE STATEMENT HEARING**

To the Honorable United States District Judge Laura Taylor Swain:

Pursuant to the Court's *Order Regarding Procedures for June 17, 2022, Disclosure Statement Hearing* [Case No. 17-3283, ECF No. 21068], the Financial Oversight and Management Board for Puerto Rico (the "Oversight Board"), as sole Title III representative of the Puerto Rico

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801). Title III case numbers are listed as Bankruptcy Case numbers due to software limitations.

Highways and Transportation Authority (“HTA” or the “Debtor”) pursuant to section 315(b) of the *Puerto Rico Oversight, Management, and Economic Stability Act* (“PROMESA”),² respectfully states as follows:

1. The following parties will appear on behalf of the Oversight Board: (i) Martin J. Bienenstock, mbienenstock@proskauer.com; (ii) Brian S. Rosen, brosen@proskauer.com; and (iii) Steve Y. Ma, sma@proskauer.com of Proskauer Rose LLP.

2. Martin J. Bienenstock, Brian S. Rosen and/or Steve Y. Ma of Proskauer Rose LLP will appear and seek to be heard on the *Motion of the Puerto Rico Highways and Transportation Authority for an Order (I) Approving Disclosure Statement, (II) Fixing Voting Record Date, (III) Approving Confirmation Hearing Notice and Confirmation Schedule, (IV) Approving Solicitation Packages and Distribution Procedures, (V) Approving Forms of Ballots, and Voting and Election Procedures, (VI) Approving Notice of Non-Voting Status, (VII) Fixing Voting, Election, and Confirmation Deadlines, and (VIII) Approving Vote Tabulation Procedures* [Case No. 17-3283, ECF No. 20654; Case No. 17-3567, ECF No. 1167] (the “Disclosure Statement Approval Motion”), as well as any and all related objections, responses, statements, joinders, and replies to the Disclosure Statement Approval Motion.

3. Brian S. Rosen and/or Steve Y. Ma of Proskauer Rose LLP will appear and seek to be heard on the *Motion of the Puerto Rico Highways and Transportation Authority for an Order Establishing, Among Other Things, Procedures and Deadlines Concerning Objections to Confirmation and Discovery in Connection Therewith* [Case No. 17-3283, ECF No. 20655; Case No. 17-3567, ECF No. 1168].

² PROMESA has been codified at 48 U.S.C. §§ 2101–2241.

4. Brian S. Rosen and/or Steve Y. Ma of Proskauer Rose LLP will appear and seek to be heard on the *Motion for Approval of Second Amended and Restated Stipulation and Agreed Order Regarding the Disputed Funds in the HTA Bond Service Accounts, Redemption Accounts and Reserve Accounts* [Case No. 17-3283, ECF No. 20987; Case No. 17-3567, ECF No. 1187].

5. Martin J. Bienenstock, Brian S. Rosen, and Steve Y. Ma of Proskauer Rose LLP, reserve the right to be heard on any matter presented to the Court and to respond to any statements made by any party in connection with the above-captioned Title III cases to the extent it impacts the interests of the Oversight Board or any of the Debtors in these Title III cases.

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WHEREFORE, the parties respectfully request that the Court take notice of the foregoing.

Dated: June 10, 2022
San Juan, Puerto Rico

Respectfully submitted,

/s/ Brian S. Rosen
Martin J. Bienenstock
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(Admission *pro hac vice*)
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EXHIBIT A

PARTY APPEARANCE COVER SHEET

PARTY APPEARANCE COVER SHEET

Name of Party	Financial Oversight and Management Board for Puerto Rico
<p>Attorney Appearance (provide the listed information for each attorney who may appear for the Party):</p> <ul style="list-style-type: none"> • Party Name Abbreviation (For Use with Zoom), • Name, • Email, • Law Firm, • Phone Number, • Docket Entry No. for the Attorney's Notice of Appearance, and • Zoom Screen Name. 	<p>FOMB Martin J. Bienenstock mbienenstock@proskauer.com Proskauer Rose LLP 212-969-4530 Docket Entry No. 90 FOMB/ Bienenstock, Martin/ Proskauer Rose LLP</p>
	<p>FOMB Brian S. Rosen brosen@proskauer.com Proskauer Rose LLP 212-969-3380 Docket Entry No. 1902 FOMB/ Rosen, Brian/ Proskauer Rose LLP</p>
	<p>FOMB Steve Y. Ma sma@proskauer.com Proskauer Rose LLP 310-284-5605 Docket Entry No. 4708 FOMB/ Ma, Steve/ Proskauer Rose LLP</p>